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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: OPTICAL DISK DRIVE PRODUCTS  
ANTITRUST LITIGATION

Case No.: 3:13-cv-03350-RS

MDL No. 2143

**JOINT STIPULATION AND [PROPOSED]  
ORDER REGARDING SERVICE OF  
PROCESS**

This Document Relates to:

DELL INC. and DELL PRODUCTS L.P.

## Plaintiffs,

V.

HITACHI-LG DATA STORAGE, INC.;  
HITACHI-LG DATA STORAGE KOREA, INC.;  
HITACHI, LTD.; PHILIPS & LITE-ON DIGITAL  
SOLUTIONS CORP.; PHILIPS & LITE-ON  
DIGITAL SOLUTIONS USA, INC.; LITE-ON IT  
CORP. OF TAIWAN; KONINKLIJKE PHILIPS  
N.V.; BENQ CORPORATION; BENQ AMERICA  
CORP.; SONY CORPORATION; SONY  
OPTIARC INC.; NEC CORPORATION; SONY  
NEC OPTIARC INC.; SONY OPTIARC  
AMERICA INC.; SONY ELECTRONICS, INC.;  
TOSHIBA CORPORATION; SAMSUNG

1 ELECTRONICS CO. LTD.; SAMSUNG  
2 ELECTRONICS AMERICA, INC.; TOSHIBA  
3 AMERICA INFORMATION SYSTEMS, INC.;  
4 TOSHIBA SAMSUNG STORAGE  
5 TECHNOLOGY CORP.; TOSHIBA SAMSUNG  
6 STORAGE TECHNOLOGY CORP. KOREA;  
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9 Defendants.  
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#### **JOINT STIPULATION**

It is stipulated by and between the undersigned parties, by their respective attorneys, that undersigned counsel of BOIES SCHILLER & FLEXNER LLP agree to accept service of the Complaint in *Dell Inc. and Dell Products L.P. v. Hitachi-LG Data Storage, Inc., et al.*, Case No. 3:13-cv-03350-RS (“Dell Complaint”), on behalf of Sony Optiarc America Inc. (“SOA”) and Sony Electronics, Inc. (“SEI”). Defendants Sony Corporation and Sony Optiarc Inc. (“Sony Optiarc”) agree to waive service of the *Dell* Complaint and Dell will mail a copy of the *Dell* Complaint to Sony Corporation and Sony Optiarc via certified mail or United Parcel Service, addressed and delivered to a designated individual in the Sony Corporation Legal Department in Japan. The deadline for SOA, SEI, Sony Corporation, and Sony Optiarc (collectively, the “Sony/Optiarc Defendants”) to answer, move to dismiss, or otherwise respond to the *Dell* Complaint shall be extended to December 6, 2013 or 90 days from receipt by all Sony/Optiarc Defendants of the *Dell* Complaint delivered in the manner described above, whichever is later. This stipulation does not constitute a waiver by the Sony/Optiarc Defendants of any defense, including but not limited to those defenses provided under Federal Rule of Civil Procedure 12.

IT IS SO STIPULATED.

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2 Dated: September 9, 2013

3 **ALSTON & BIRD LLP**

4 /s/ Rodney J. Ganske

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9 Attorney for Plaintiffs Dell Inc. and Dell  
10 Products L.P.

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Attorney for Defendants Sony Corporation,  
Sony Optiarc America, Inc., Sony Optiarc  
Inc., and Sony Electronics, Inc.

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17 IT IS SO ORDERED.  
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20 Dated: 9/12/13

  
21 RICHARD SEEBORG  
22 UNITED STATES DISTRICT JUDGE  
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